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4 Schweet Linde & Coulson, PLLC
5 575 S. Michigan St.
6 Seattle, WA 98108
7 P: (206) 275-1010
8 F: (206) 381-0101

Honorable Judge Marc Barreca
Hearing Location: ZOOM.GOV
Hearing Date: August 10, 2022
Hearing Time: 10:00 a.m.
Response Date: August 3, 2022

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IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re

TIMOTHY DONALD EYMAN,

Debtor.

Case No.: 18-14536-MLB

NOTICE OF MOTION FOR ORDER
APPROVING COMPROMISE AND
SETTLEMENT OF ADVERSARY
PROCEEDING, ALLOWING
ABANDONMENT OF CERTAIN
PROPERTY, AND AUTHORIZING SALE
OF REAL PROPERTY FREE AND CLEAR
OF LIENS AND OTHER INTERESTS

NOTICE

19 Virginia Burdette, the appointed Trustee in the above-captioned Chapter 7 bankruptcy case
20 (“the Trustee”), by and through her legal counsel Schweet, Linde & Coulson PLLC, has filed a
21 Motion for Order Approving Compromise and Settlement of Adversary Proceeding, Allowing
22 Abandonment of Certain Property, and Authorizing Sale of Real Property Free and Clear and Liens
23 and Other Interests (the “Motion”). She brings her request before this court, pursuant to 11 U.S.C.
24 §363(b), §363(f), §363(m) and §554(a), and pursuant to Bankruptcy Rules 2002, 6004, 9013, and
25 9019.
26

NOTICE 1

SCHWEET LINDE & COULSON, PLLC

575 S. MICHIGAN ST.
SEATTLE, WA 98108

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1 By this Motion, the Trustee seeks an Order approving the agreed compromise and
2 settlement of claims, as set forth in the Settlement Agreement attached as Exhibit 1 to the Trustee's
3 declaration filed in support of the Motion. The terms of the Settlement were negotiated and agreed
4 to in good faith by and between the State of Washington ("the State"), Timothy Donald Eyman
5 ("the Debtor" or "Timothy Eyman"), Karen Eyman n/k/a Karen Williams ("Karen Williams" or
6 "Ms. Williams"), Goodstein Law Group PLLC ("GLG"), and the Trustee representing the interests
7 of the bankruptcy estate.
8

9 The Trustee further moves this Court for an Order allowing the abandonment of certain
10 property of the bankruptcy estate pursuant to §554(a). Abandonment of this certain property,
11 which is listed in Exhibit A to the Settlement Agreement, is a negotiated part of the Settlement.
12

13 The Trustee further moves this Court for an Order authorizing the sale of real property
14 commonly known as 11913 59th Avenue West, Mukilteo, Washington, Tax Parcel Number
15 00834700000500, free and clear of liens and other interests, as specified in her Motion, pursuant
16 to §363(b) and (f), to Karen Williams, under the terms of a Residential Purchase and Sale
17 Agreement, a copy of which is attached as Exhibit 2 to the Trustee's declaration filed in support
18 of the Motion.

19 A copy of the pleadings in support of the Motion may be obtained from PACER, at the
20 bankruptcy court clerk's office, or by contacting the undersigned attorney at the email or mailing
21 addresses below.
22

23 The Motion IS SET FOR HEARING as follows:

24 JUDGE: The Honorable Marc L. Barreca DATE: August 10, 2022

25 PLACE: ZOOM.GOV (instructions below) TIME: 10:00

26 RESPONSE DATE: August 3, 2022

NOTICE 2

SCHWEET LINDE & COULSON, PLLC

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SEATTLE, WA 98108

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Hearing Instructions:

Zoom

<https://www.zoomgov.com/j/1607704823?pwd=TUYxditUQ211OWdNeXVuYlZ5bTdBUT09>

Meeting ID: 160 770 4823

Passcode: 781136

One tap mobile

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[+1 646 828 7666](tel:+16468287666) US (New York)

[+1 551 285 1373](tel:+15512851373) US

Meeting ID: 160 [770 4823](https://www.zoomgov.com/j/1607704823)

Find your local number: <https://www.zoomgov.com/u/aCksE5Pde>(link is external)

- Please do not attempt to record this session. It is prohibited.
- Please set your Zoom user name to show your first and last name only
- If you are disconnected from the session and can't rejoin, email the judge's judicial assistant at: Jessica_Smith@wawb.uscourts.gov
- Please join this Zoom session 15 mins prior to the scheduled start of the hearing.
- If attending this meeting via Video: Select the "Join ZoomGov Meeting" link below to join the session.
- If attending this meeting via Phone-only (no video):
Cell phone users: Select one of the "One tap mobile" (San Jose) options listed below to connect
- Landline users: Dial one of the "Dial by your location (San Jose)" numbers listed below >
Enter the "Meeting ID" when prompted > Press # when prompted for "Personal Meeting ID"
- Choose a quiet location without distractions.
- Choose an area with good light, but not too much bright light behind you.
- For better sound quality, use a headset with built-in mic (or make sure you are close to your microphone).
- Turn off apps that have built-in sounds, minimizing background noise.
- Check and confirm, in advance of the hearing, that you have a working camera and microphone on your device.
- If you run into technical issues or have questions, send email to: curtis_udy@wawb.uscourts.gov

1 IF YOU OPPOSE the Motion, you must file your written response with the court clerk at
2 6301 U.S. Courthouse, 700 Stewart Street, Seattle WA 98101, serve two copies on the Judge's
3 Chambers, and deliver copies to the undersigned NOT LATER THAN THE RESPONSE DATE,
4 which is **August 3, 2022**.

5 IF NO REPSONSE IS TIMELY FILED AND SERVED, the Court may, in its discretion,
6 GRANT THE MOTION PRIOR TO THE HEARING, WITHOUT FURTHER NOTICE, and
7 strike the hearing.
8

9 DATED this 30th day of June, 2022.

10 **SCHWEET LINDE & COULSON, PLLC**

11 /s/Thomas S. Linde

12 Thomas S. Linde, WSBA #14426

13 Michael M. Sperry, WSBA #43760

14 Latife H. Neu, WSBA #33144

15 tomlinde@schweetlaw.com

16 Attorneys for Virginia Burdette, Chapter 7 Trustee
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